

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DISTRICT

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:13 CR00222 JAR (SPM)
	)	
THOMAS ZELL,	)	
	)	
Defendant.	)	

**GOVERNMENT'S DISCLOSURE OF ARGUABLY SUPPRESSIBLE EVIDENCE**  
**PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 12(b)(4)**

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Erin Granger, Assistant United States Attorney for said District, and makes the following disclosures pursuant to Federal Rule of Criminal Procedure 12(b)(4):

At trial, the Government intends to use the evidence seized during the execution of a consent search and search warrant on Defendant's residence on May 10, 2010 and statements made by Defendant to law enforcement on May 10, 2010. This evidence and these statements are more fully set forth in investigative reports which have been made available to defendant.

As additional evidence is found, and as supplemental information comes to the government's attention, the government may choose not to use some evidence described, or to use evidence additional to that listed in these reports. If the government chooses to use additional evidence, a supplemental Rule 12(b)(4) notice will be filed.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

s/ Erin Granger  
ERIN GRANGER, #53593MO  
Assistant United States Attorney  
111 South 10th Street, Room 20.333  
St. Louis, MO 63102  
(314) 539-2200

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2013, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Erin Granger  
ERIN GRANGER, #53593MO  
Assistant United States Attorney